



Warren Norred <warren@norredlaw.com>

RE: 3:22-cv-970-X, Interrogatories to ZT

1 message

Hung, Richard S. J. <RHung@mofo.com>

Mon, Jun 26, 2023 at 12:01 PM

To: Warren Norred <wnorred@norredlaw.com>, "Gerrish, Gina L." <GGerrish@mofo.com>, MoFo_VMware_ZT

<MoFo_VMware_ZT@mofo.com>, "Ranieri, Vera" <VRanieri@mofo.com>

Cc: Alec Turung <alec@norredlaw.com>, Ty Harding <ty@norredlaw.com>, Marie Anderson <marie@norredlaw.com>

We are considering next steps in view of your client's stated inability to satisfy the fee award.

Rich

RICHARD S.J. HUNG

T: (415) 268-7602

C: (415) 412-1865

rhung@mofo.com**MORRISON
FOERSTER**

From: Warren Norred <wnorred@norredlaw.com>**Sent:** Monday, June 26, 2023 9:56 AM**To:** Hung, Richard S. J. <RHung@mofo.com>; Gerrish, Gina L. <GGerrish@mofo.com>; MoFo_VMware_ZT <MoFo_VMware_ZT@mofo.com>; Ranieri, Vera <VRanieri@mofo.com>**Cc:** Alec Turung <alec@norredlaw.com>; Ty Harding <ty@norredlaw.com>; Marie Anderson <marie@norredlaw.com>**Subject:** Re: 3:22-cv-970-X, Interrogatories to ZT**External Email**

All,

Where are we on this? ZT is eager to satisfy your client's need for information and be done.

Let me reiterate - there are no assets available to satisfy any judgment, other than the subject patent.

Thanks,
Warren

Warren V. Norred, P.E.
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817.524.6686 fax

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On Mon, Jun 5, 2023 at 5:27 PM Warren Norred <wnorred@norredlaw.com> wrote:

The company has no assets and won't be paying anything.

W

Warren V. Norred, P.E.
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On Mon, Jun 5, 2023 at 4:25 PM Hung, Richard S. J. <RHung@mofo.com> wrote:

Hi Warren,

I relayed, but the client would payment for its fees rather than an asset transfer.

Rich

RICHARD S.J. HUNG

T: (415) 268-7602

C: (415) 412-1865

rhung@mofo.com

**MORRISON
FOERSTER**



From: Warren Norred <wnorred@norredlaw.com>

Sent: Monday, June 5, 2023 11:45 AM

To: Hung, Richard S. J. <RHung@mofo.com>

Cc: Alec Turung <alec@norredlaw.com>; Gerrish, Gina L. <GGerrish@mofo.com>; MoFo_VMware_ZT <MoFo_VMware_ZT@mofo.com>; Ty Harding <ty@norredlaw.com>; Marie Anderson <marie@norredlaw.com>

Subject: Re: 3:22-cv-970-X, Interrogatories to ZT

External Email

Richard, where are we on resolving this?

Just checking in,

Warren

Warren V. Norred, P.E.

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Arlington, Texas 76010

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On Fri, May 5, 2023 at 5:01 PM Hung, Richard S. J. <RHung@mofo.com> wrote:

Received this – thanks, and also just got your voicemail. I will relay to VMware.

RICHARD S.J. HUNG

T: (415) 268-7602

C: (415) 412-1865

rhung@mofo.com

**MORRISON
FOERSTER**

From: Warren Norred <wnorred@norredlaw.com>

Sent: Friday, May 5, 2023 3:00 PM

To: Hung, Richard S. J. <RHung@mofo.com>

Cc: Alec Turung <alec@norredlaw.com>

Subject: 3:22-cv-970-X, Interrogatories to ZT

External Email

Richard, I am assisting ZT on these interrogatories.

While we're working on these, I'm authorized to settle the dispute by assigning the subject patent to your organization. I realize that you'll want the details of any assets of ZT, but we'll find that it has nothing of value other than the patent, so we could work on this in parallel.

Holler with any questions and we'll be in touch.



Yours,
Warren

Warren V. Norred, P.E.
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